

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
CHARGE AGAINST EMPLOYER

| DO NOT WRITE IN THIS SPACE | |
|-----------------------------|-------------------------------|
| Case 31-CA-290326 | Date Filed 2/8/2022 |

INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

| | | |
|---|---|---|
| a. Name of Employer University of Southern California (USC) Pac-12 Conference The National Collegiate Athletics Association (NCAA) | | b. Tel. No. USC 213-740-7922; Pac-12: 415-580-4200; NCAA: 317-917-6222 |
| | | c. Cell No. |
| | | f. Fax No. |
| d. Address (Street, city, state, and ZIP code) USC: 3551 Trousdale Parkway, ADM 352, Los Angeles, CA 90089-5013; Pac-12: 360 3rd St, 3rd Floor, San Francisco, CA 94107; NCAA: 1802 Alonzo Watford Senior Drive, Indianapolis, IN 46202 | e. Employer Representative (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) | g. e-mail (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) |
| | | h. Number of workers employed 113 |
| i. Type of Establishment (factory, mine, wholesaler, etc.) University, Athletic Conference, Athletic Association | j. Identify principal product or service Intercollegiate Athletics - FBS Football, NCAA Division I Men's and Women's Basketball | |

The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)

Within the past 6 months, the employers have interfered with, restrained, and coerced its employees in the exercise of rights protected by Section 7 of the Act by repeatedly misclassifying employees as "student-athlete" nonemployees to circumvent the Act and their right under the Act. Within the past 6 months, the employers have interfered with, restrained, and coerced its employees in the exercise of rights protected by Section 7 of the Act by maintaining unlawful rules and policies in its handbook, including restricting communications with third parties, third parties, in the media, on social media, related to discipline, etc.

3. Full name of party filing charge (if labor organization, give full name, including local name and number)

National College Players Association

| | |
|--|--|
| 4a. Address (Street and number, city, state, and ZIP code) 6709 Borges St. Corona, CA 92880 | 4b. Tel. No. 951-898-0985 |
| | 4c. Cell No. |
| | 4d. Fax No. |
| | 4e. e-mail rhuma@ncpanow.org |

5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)**6. DECLARATION**

I declare that I have read the above charge and that the statements
are true to the best of my knowledge and belief.



Ramogi Huma, Executive Director

(signature of representative or person making charge)

(Print/type name and title or office, if any)

6709 Borges St., Corona, CA 92880

2/8/2022

Address

Date

Tel. No.
951-898-0985**Office, if any, Cell No.****Fax No.****e-mail**
rhuma@ncpanow.org**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT**

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 *et seq.* The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.



UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD

REGION 31
11500 W OLYMPIC BLVD
SUITE 600
Los Angeles, CA 90064-1753

Agency Website: www.nlr.gov
Telephone: (310) 235-7351
Fax: (310) 235-7420



Download
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February 9, 2022

(b) (6), (b) (7)(C)

University of Southern California (USC)
3551 Trousdale Parkway, ADM 352
Los Angeles, CA 90089-5013

(b) (6), (b) (7)(C)

Pac-12 Conference
360 3rd Street, 3rd Floor
San Francisco, CA 94107

(b) (6), (b) (7)(C)

The National Collegiate Athletics Association
(NCAA)
1802 Alonzo Watford Senior Drive
Indianapolis, IN 46202

Re: University of Southern California (USC),
Pac-12 Conference, and The National
Collegiate Athletics Association (NCAA)
Case 31-CA-290326

Dear (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C)

Enclosed is a copy of a charge that has been filed in this case. This letter tells you how to contact the Board agent who will be investigating the charge, explains your right to be represented, discusses presenting your evidence, and provides a brief explanation of our procedures, including how to submit documents to the NLRB.

Investigator: This charge is being investigated by Field Attorney Amanda Laufer whose telephone number is (310) 307-7337. If this Board agent is not available, you may contact Supervisory Field Attorney Joanna Silverman whose telephone number is (310) 307-7309.

Right to Representation: You have the right to be represented by an attorney or other representative in any proceeding before us. If you choose to be represented, your representative must notify us in writing of this fact as soon as possible by completing *Form NLRB-4701, Notice of Appearance*. This form is available on our website, www.nlr.gov, or from an NLRB office upon your request.

If you are contacted by someone about representing you in this case, please be assured that no organization or person seeking your business has any "inside knowledge" or favored relationship with the National Labor Relations Board. Their knowledge regarding this proceeding was only obtained through access to information that must be made available to any member of the public under the Freedom of Information Act.

Presentation of Your Evidence: We seek prompt resolutions of labor disputes. Therefore, I urge you or your representative to submit a complete written account of the facts and a statement of your position with respect to the allegations set forth in the charge as soon as possible. If the Board agent later asks for more evidence, I strongly urge you or your representative to cooperate fully by promptly presenting all evidence relevant to the investigation. In this way, the case can be fully investigated more quickly.

Full and complete cooperation includes providing witnesses to give sworn affidavits to a Board agent, and providing all relevant documentary evidence requested by the Board agent. Sending us your written account of the facts and a statement of your position is not enough to be considered full and complete cooperation. A refusal to fully cooperate during the investigation might cause a case to be litigated unnecessarily.

In addition, either you or your representative must complete the enclosed Commerce Questionnaire to enable us to determine whether the NLRB has jurisdiction over this dispute. If you recently submitted this information in another case, or if you need assistance completing the form, please contact the Board agent.

We will not honor requests to limit our use of position statements or evidence. Specifically, any material you submit may be introduced as evidence at a hearing before an administrative law judge regardless of claims of confidentiality. However, certain evidence produced at a hearing may be protected from public disclosure by demonstrated claims of confidentiality.

Further, the Freedom of Information Act may require that we disclose position statements or evidence in closed cases upon request, unless an exemption applies, such as those protecting confidential financial information or personal privacy interests.

Preservation of all Potential Evidence: Please be mindful of your obligation to preserve all relevant documents and electronically stored information (ESI) in this case, and to take all steps necessary to avoid the inadvertent loss of information in your possession, custody or control. Relevant information includes, but is not limited to, paper documents and all ESI (e.g. SMS text messages, electronic documents, emails, and any data created by proprietary software tools) related to the above-captioned case.

Prohibition on Recording Affidavit Interviews: It is the policy of the General Counsel to prohibit affiants from recording the interview conducted by Board agents when subscribing Agency affidavits. Such recordings may impede the Agency's ability to safeguard the confidentiality of the affidavit itself, protect the privacy of the affiant and potentially compromise the integrity of the Region's investigation.

Correspondence: All documents submitted to the Region regarding your case MUST be filed through the Agency's website, www.nlr.gov. This includes all formal pleadings, briefs, as well as affidavits, documentary evidence, and position statements. The Agency requests all

evidence submitted electronically to be in the form it is normally used and maintained in the course of business (i.e., native format). Where evidence submitted electronically is not in native format, it should be submitted in a manner that retains the essential functionality of the native format (i.e., in a machine-readable and searchable electronic format).

If you have questions about the submission of evidence or expect to deliver a large quantity of electronic records, please promptly contact the Board agent investigating the charge. If you cannot e-file your documents, you must provide a statement explaining why you do not have access to the means for filing electronically or why filing electronically would impose an undue burden.

In addition, this Region will be issuing case-related correspondence and documents, including complaints, compliance specifications, dismissal letters, deferral letters, and withdrawal letters, electronically to the email address you provide. Please ensure that you receive important case-related correspondence, please ensure that the Board Agent assigned to your case has your preferred email address. These steps will ensure that you receive correspondence faster and at a significantly lower cost to the taxpayer. If there is some reason you are unable to receive correspondence via email, please contact the agent assigned to your case to discuss the circumstances that prevent you from using email.

Information about the Agency, the procedures we follow in unfair labor practice cases and our customer service standards is available on our website, www.nlr.gov or from an NLRB office upon your request. *NLRB Form 4541, Investigative Procedures* offers information that is helpful to parties involved in an investigation of an unfair labor practice charge.

We can provide assistance for persons with limited English proficiency or disability. Please let us know if you or any of your witnesses would like such assistance.

Very truly yours,

A handwritten signature in black ink that reads "Mori Rubin". The signature is written in a cursive, flowing style.

Mori Rubin
Regional Director

Enclosures:

1. Copy of Charge
2. Commerce Questionnaire



UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD

REGION 31
11500 W OLYMPIC BLVD
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Los Angeles, CA 90064-1753

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February 9, 2022

Ramogi Huma, Executive Director
National College Players Association
6709 Borges St.
Corona, CA 92880

Re: University of Southern California (USC),
Pac-12 Conference, and The National
Collegiate Athletics Association (NCAA)
Case 31-CA-290326

Dear Mr. Huma:

The charge that you filed in this case on February 08, 2022 has been docketed as case number 31-CA-290326. This letter tells you how to contact the Board agent who will be investigating the charge, explains your right to be represented, discusses presenting your evidence, and provides a brief explanation of our procedures, including how to submit documents to the NLRB.

Investigator: This charge is being investigated by Field Attorney Amanda Laufer whose telephone number is (310) 307-7337. If this Board agent is not available, you may contact Supervisory Field Attorney Joanna Silverman whose telephone number is (310) 307-7309.

Right to Representation: You have the right to be represented by an attorney or other representative in any proceeding before us. If you choose to be represented, your representative must notify us in writing of this fact as soon as possible by completing *Form NLRB-4701, Notice of Appearance*. This form is available on our website, www.nlr.gov, or from an NLRB office upon your request.

If you are contacted by someone about representing you in this case, please be assured that no organization or person seeking your business has any "inside knowledge" or favored relationship with the National Labor Relations Board. Their knowledge regarding this proceeding was only obtained through access to information that must be made available to any member of the public under the Freedom of Information Act.

Presentation of Your Evidence: As the party who filed the charge in this case, it is your responsibility to meet with the Board agent to provide a sworn affidavit, or provide other witnesses to provide sworn affidavits, and to provide relevant documents within your possession. Because we seek to resolve labor disputes promptly, you should be ready to promptly present your affidavit(s) and other evidence. If you have not yet scheduled a date and time for the Board agent to take your affidavit, please contact the Board agent to schedule the affidavit(s). If you fail to cooperate in promptly presenting your evidence, your charge may be dismissed without investigation.

Preservation of all Potential Evidence: Please be mindful of your obligation to preserve all relevant documents and electronically stored information (ESI) in this case, and to take all steps necessary to avoid the inadvertent loss of information in your possession, custody or control. Relevant information includes, but is not limited to, paper documents and all ESI (e.g. SMS text messages, electronic documents, emails, and any data created by proprietary software tools) related to the above-captioned case.

Prohibition on Recording Affidavit Interviews: It is the policy of the General Counsel to prohibit affiants from recording the interview conducted by Board agents when subscribing Agency affidavits. Such recordings may impede the Agency's ability to safeguard the confidentiality of the affidavit itself, protect the privacy of the affiant and potentially compromise the integrity of the Region's investigation.

Correspondence: All documents submitted to the Region regarding your case MUST be filed through the Agency's website, www.nlrb.gov. This includes all formal pleadings, briefs, as well as affidavits, documentary evidence, and position statements. The Agency requests all evidence submitted electronically to be in the form it is normally used and maintained in the course of business (i.e., native format). Where evidence submitted electronically is not in native format, it should be submitted in a manner that retains the essential functionality of the native format (i.e., in a machine-readable and searchable electronic format).

If you have questions about the submission of evidence or expect to deliver a large quantity of electronic records, please promptly contact the Board agent investigating the charge. If you cannot e-file your documents, you must provide a statement explaining why you do not have access to the means for filing electronically or why filing electronically would impose an undue burden.

In addition, this Region will be issuing case-related correspondence and documents, including complaints, compliance specifications, dismissal letters, deferral letters, and withdrawal letters, electronically to the email address you provide. Please ensure that you receive important case-related correspondence, please ensure that the Board Agent assigned to your case has your preferred email address. These steps will ensure that you receive correspondence faster and at a significantly lower cost to the taxpayer. If there is some reason you are unable to receive correspondence via email, please contact the agent assigned to your case to discuss the circumstances that prevent you from using email.

Information about the Agency, the procedures we follow in unfair labor practice cases and our customer service standards is available on our website, www.nlrb.gov or from an NLRB office upon your request. *NLRB Form 4541, Investigative Procedures* offers information that is helpful to parties involved in an investigation of an unfair labor practice charge.

We can provide assistance for persons with limited English proficiency or disability.
Please let us know if you or any of your witnesses would like such assistance.

Very truly yours,

A handwritten signature in black ink that reads "Mori Rubin". The signature is written in a cursive, flowing style.

Mori Rubin
Regional Director

Form NLRB - 501 (3-21)

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD**FIRST AMENDED CHARGE AGAINST EMPLOYER****INSTRUCTIONS:**

| DO NOT WRITE IN THIS SPACE | |
|----------------------------|------------|
| Case | Date Filed |
| 31-CA-290326 | |


File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

| | | | |
|---|--|---|------------|
| 1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT | | | |
| a. Name of Employer #1 (See additional employers in attachment) University of Southern California (USC), Pac-12 Conference, and The National Collegiate Athletics Association (NCAA), as joint employers | | b. Tel. No. USC: (213)740-7922 [See Attachment] | |
| | | c. Cell No. | |
| d. Address (Street, city, state, and ZIP code) USC: 3551 Trousdale Parkway, ADM 352, Los Angeles, CA 90089-5013 [See Attachment] | e. Employer Representative USC: (b) (6), (b) (7)(C) [See Attachment] | | f. Fax No. |
| | | g. e-mail (b) (6), (b) (7)(C) @usc.edu [See Attachment] | |
| | | h. Number of workers employed 113 | |
| i. Type of Establishment (factory, mine, wholesaler, etc.) USC - University | | j. Identify Principal Product or Service Intercollegiate Athletics – FBS Football, NCAA Division I Men's and Women's Basketball | |

1. The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)
Within the past six months, the above-named employers have interfered with, restrained, and coerced employees in the exercise of rights protected by Section 7 of the Act by repeatedly misclassifying employees as "student-athlete" nonemployees to circumvent the Act and their rights under the Act.

Within the past six months, the above-named employers have interfered with, restrained, and coerced employees in the exercise of rights protected by Section 7 of the Act by maintaining unlawful rules and policies in its handbook, including restricting communications with third parties, in the media, on social media, related to discipline, etc.

| | |
|---|---------------------------------|
| 3. Full name of party filing charge (if labor organization, give full name, including local name and number) National College Players Association | |
| 4a. Address (Street and number, city, state, and ZIP code) 6709 Borges St. Corona, CA 92880 | 4b. Tel. No. (951) 898-0985 |
| | 4c. Cell No. |
| | 4d. Fax No. |
| | 4e. e-mail rhuma@ncpanow.org |
| 5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization) | |
| 6. DECLARATION | |
| I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief. | |
|  (signature of representative or person making charge) | |
| Ramogi Huma, Executive Director (Print/type name and title or office, if any) | |
| Address: 6709 Borges St. Corona, CA 92880 | |
| Date: 2/16/22 | |
| Tel. No. (951) 898-0985 | |
| Office, if any, Cell No. | |
| Fax No. | |
| e-mail rhuma@ncpanow.org | |

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001) PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information will cause the NLRB to decline to invoke its processes.

Additional Employer Information**Employer #2**

| | | |
|--|--|--------------------------------------|
| a. Name of Employer Pac-12 Conference | | b. Tel. No. (415) 580-4200 |
| | | c. Cell No. |
| d. Address (Street, city, state, and ZIP code) 360 3rd Street, 3rd Floor San Francisco, CA 94107 | e. Employer Representative (b) (6), (b) (7)(C) | f. Fax No. |
| i. Type of Establishment (factory, mine, wholesaler, etc.) Athletic Conference | j. Identify Principal Product or Service Intercollegiate Athletics – FBS Football, NCAA Division I Men's and Women's Basketball | g. e-mail |
| | | h. Number of Workers Employed 113 |

Employer #3

| | | |
|--|--|---|
| a. Name of Employer The National Collegiate Athletics Association (NCAA) | | b. Tel. No. (317) 917-6222 |
| | | c. Cell No. |
| d. Address (Street, city, state, and ZIP code) 1802 Alonzo Watford Senior Drive Indianapolis, IN 46202 | e. Employer Representative (b) (6), (b) (7)(C) | f. Fax No. |
| i. Type of Establishment (factory, mine, wholesaler, etc.) Athletic Association | j. Identify Principal Product or Service Intercollegiate Athletics – FBS Football, NCAA Division I Men's and Women's Basketball | g. e-mail (b) (6), (b) (7)(C)@ncaa.org |
| | | h. Number of Workers Employed 113 |



Attorneys at Law

Adam Abrahms
t 310.557.9559
f 310.943.3367
AAbrahms@ebglaw.com

February 18, 2022

VIA E-FILE

Amanda Laufer
Field Attorney
National Labor Relations Board
Region 31
11500 W Olympic Blvd, Suite 600
Los Angeles, CA 90064-1753

Re: University of Southern California
Case: 31-CA-290326

Dear Ms. Laufer:

This firm represents the Respondent, University of Southern California (“USC”) with respect to labor matters including the above-referenced matter. Please accept this letter as the firm’s Notice of Appearance on behalf of USC.

Also, please direct all future inquiries and correspondences regarding this matter to Michael Ferrell (312-499-1480; MFerrell@ebglaw.com), as well as to the undersigned.

Should you have any questions, please do not hesitate to contact us.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Adam Abrahms', is written over a horizontal blue line. Below the signature, the name 'Adam Abrahms' is printed in a black, sans-serif font.

Adam Abrahms

cc: Michael Ferrell



UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD

REGION 31
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Los Angeles, CA 90064-1753

Agency Website: www.nlr.gov
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Fax: (310)235-7420



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February 23, 2022

Adam C. Abrahms, Attorney at Law
Epstein Becker & Green, PC
1925 Century Park East, Suite 500
Los Angeles, CA 90067-2706

Michael Ferrell, Esquire
Epstein Becker & Green, P.C.
1925 Century Park East, Suite 500
Los Angeles, CA 90067

Re: University of Southern California (USC),
Pac-12 Conference, and The National
Collegiate Athletics Association (NCAA),
as joint employers
Case 31-CA-290326

Dear Mr. Abrahms, Mr. Ferrell:

Enclosed is a copy of the first amended charge that has been filed in this case.

Investigator: This charge is being investigated by Field Attorney AMANDA LAUFER whose telephone number is (310)307-7337. If the agent is not available, you may contact Supervisory Field Attorney JOANNA SILVERMAN whose telephone number is (310)307-7309.

Presentation of Your Evidence: As you know, we seek prompt resolutions of labor disputes. Therefore, I urge you or your representative to submit a complete written account of the facts and a statement of your position with respect to the allegations in the first amended charge as soon as possible. If the Board agent later asks for more evidence, I strongly urge you or your representative to cooperate fully by promptly presenting all evidence relevant to the investigation. In this way, the case can be fully investigated more quickly.

Preservation of all Potential Evidence: Please be mindful of your obligation to preserve all relevant documents and electronically stored information (ESI) in this case, and to take all steps necessary to avoid the inadvertent loss of information in your possession, custody or control. Relevant information includes, but is not limited to, paper documents and all ESI (e.g. SMS text messages, electronic documents, emails, and any data created by proprietary software tools) related to the above-captioned case.

Prohibition on Recording Affidavit Interviews: It is the policy of the General Counsel to prohibit affiants from recording the interview conducted by Board agents when subscribing Agency affidavits. Such recordings may impede the Agency's ability to safeguard the

confidentiality of the affidavit itself, protect the privacy of the affiant and potentially compromise the integrity of the Region's investigation.

Procedures: Pursuant to Section 102.5 of the Board's Rules and Regulations, parties must submit all documentary evidence, including statements of position, exhibits, sworn statements, and/or other evidence, by electronically submitting (E-Filing) them through the Agency's web site (www.nlr.gov). You must e-file all documents electronically or provide a written statement explaining why electronic submission is not possible or feasible. Failure to comply with Section 102.5 will result in rejection of your submission. The Region will make its determination on the merits solely based on the evidence properly submitted. All evidence submitted electronically should be in the form in which it is normally used and maintained in the course of business (i.e., native format). Where evidence submitted electronically is not in native format, it should be submitted in a manner that retains the essential functionality of the native format (i.e., in a machine-readable and searchable electronic format). If you have questions about the submission of evidence or expect to deliver a large quantity of electronic records, please promptly contact the Board agent investigating the charge.

If the Agency does not issue a formal complaint in this matter, parties will be notified of the Regional Director's decision by email. Please ensure that the agent handling your case has your current email address.

Very truly yours,

A handwritten signature in black ink that reads "Mori Rubin". The signature is written in a cursive, flowing style.

MORI RUBIN
Regional Director

Enclosure: Copy of first amended charge

University of Southern California (USC),
Pac-12 Conference, and The National
Collegiate Athletics Association (NCAA),
as joint employers
Case 31-CA-290326

- 3 -

February 23, 2022

cc:

(b) (6), (b) (7)(C)

University of Southern California (USC)
3551 Trousdale Parkway, ADM 352
Los Angeles, CA 90089-5013

(b) (6), (b) (7)(C)

Pac-12 Conference
360 3rd Street, 3rd Floor
San Francisco, CA 94107

(b) (6), (b) (7)(C)

The National Collegiate Athletics
Association (NCAA)
1802 Alonzo Watford Senior Drive
Indianapolis, IN 46202



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Telephone: (310)235-7351
Fax: (310)235-7420



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February 23, 2022

Ramogi Huma, Executive Director
National College Players Association
6709 Borges St.
Corona, CA 92880

Re: University of Southern California (USC),
Pac-12 Conference, and The National
Collegiate Athletics Association (NCAA),
as joint employers
Case 31-CA-290326

Dear Mr. Huma:

We have docketed the first amended charge that you filed in this case.

Investigator: This charge is being investigated by Field Attorney AMANDA LAUFER whose telephone number is (310)307-7337. If the agent is not available, you may contact Supervisory Field Attorney JOANNA SILVERMAN whose telephone number is (310)307-7309.

Presentation of Your Evidence: As the party who filed the charge in this case, it is your responsibility to meet with the Board agent to provide a sworn affidavit, or provide other witnesses to provide sworn affidavits, and to provide relevant documents within your possession. If you have additional evidence regarding the allegations in the first amended charge and you have not yet scheduled a date and time for the Board agent to obtain that evidence, please contact the Board agent to arrange to present that evidence. If you fail to cooperate in promptly presenting your evidence, your charge may be dismissed.

Preservation of all Potential Evidence: Please be mindful of your obligation to preserve all relevant documents and electronically stored information (ESI) in this case, and to take all steps necessary to avoid the inadvertent loss of information in your possession, custody or control. Relevant information includes, but is not limited to, paper documents and all ESI (e.g. SMS text messages, electronic documents, emails, and any data created by proprietary software tools) related to the above-captioned case.

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Procedures: Pursuant to Section 102.5 of the Board's Rules and Regulations, parties must submit all documentary evidence, including statements of position, exhibits, sworn

statements, and/or other evidence, by electronically submitting (E-Filing) them through the Agency's web site (www.nlr.gov). You must e-file all documents electronically or provide a written statement explaining why electronic submission is not possible or feasible. Failure to comply with Section 102.5 will result in rejection of your submission. The Region will make its determination on the merits solely based on the evidence properly submitted. All evidence submitted electronically should be in the form in which it is normally used and maintained in the course of business (i.e., native format). Where evidence submitted electronically is not in native format, it should be submitted in a manner that retains the essential functionality of the native format (i.e., in a machine-readable and searchable electronic format). If you have questions about the submission of evidence or expect to deliver a large quantity of electronic records, please promptly contact the Board agent investigating the charge.

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Very truly yours,

A handwritten signature in black ink that reads "Mori Rubin". The signature is written in a cursive, flowing style.

MORI RUBIN
Regional Director

NATIONAL LABOR RELATIONS BOARD

NOTICE OF APPEARANCE

University of Southern California (USC), Pac-12 Conference,
and The National Collegiate Athletics Association (NCAA)

and

CASE 31-CA-290326

☒ REGIONAL DIRECTOR

☐ EXECUTIVE SECRETARY
NATIONAL LABOR RELATIONS BOARD
Washington, DC 20570

☐ GENERAL COUNSEL
NATIONAL LABOR RELATIONS BOARD
Washington, DC 20570

THE UNDERSIGNED HEREBY ENTERS APPEARANCE AS REPRESENTATIVE OF _____
PAC-12 Conference


IN THE ABOVE-CAPTIONED MATTER.

CHECK THE APPROPRIATE BOX(ES) BELOW:

☒ REPRESENTATIVE IS AN ATTORNEY

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SIGNATURE: 
(Please sign in ink.)
DATE: 3/3/2022

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NATIONAL LABOR RELATIONS BOARD

NOTICE OF APPEARANCE

University of Southern California (USC), Pac-12 Conference,
and The National Collegiate Athletics Association (NCAA)

and

CASE 31-CA-290326

☒ REGIONAL DIRECTOR

☐ EXECUTIVE SECRETARY
NATIONAL LABOR RELATIONS BOARD
Washington, DC 20570

☐ GENERAL COUNSEL
NATIONAL LABOR RELATIONS BOARD
Washington, DC 20570

THE UNDERSIGNED HEREBY ENTERS APPEARANCE AS REPRESENTATIVE OF _____
PAC-12 Conference


IN THE ABOVE-CAPTIONED MATTER.

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(REPRESENTATIVE INFORMATION)

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University of Southern California (USC), Pac-12 Conference,
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☐ GENERAL COUNSEL
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PAC-12 Conference

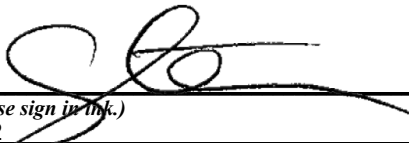
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(REPRESENTATIVE INFORMATION)

NAME: Stacey R. Eisenstein
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NATIONAL LABOR RELATIONS BOARD

NOTICE OF APPEARANCE

University of Southern California (USC), Pac-12 Conference,
and The National Collegiate Athletic Association (NCAA), as
joint employers

and

National College Players Association

CASE 31-CA-290326

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☐ EXECUTIVE SECRETARY
NATIONAL LABOR RELATIONS BOARD
Washington, DC 20570

☐ GENERAL COUNSEL
NATIONAL LABOR RELATIONS BOARD
Washington, DC 20570

THE UNDERSIGNED HEREBY ENTERS APPEARANCE AS REPRESENTATIVE OF _____

The National Collegiate Athletic Association

IN THE ABOVE-CAPTIONED MATTER.

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SIGNATURE: 

(Please sign in ink.)

March 25, 2022

DATE: _____

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(REPRESENTATIVE INFORMATION)

NAME: Amy Moor Gaylord

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CELL PHONE NUMBER: _____ FAX: (312) 424-1900

SIGNATURE: Amy Moor Gaylord

DATE: _____

(Please sign in ink)

March 25, 2022

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(REPRESENTATIVE INFORMATION)

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OFFICE TELEPHONE NUMBER: (312) 634-5739

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SIGNATURE: *LaKeisha Marsh*
(Please sign in ink.)

DATE: March 25, 2022

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Adam C. Abrahms
t 310.557.9559
f 310.943.3367
AAbrahms@ebglaw.com

April 28, 2022

VIA EMAIL

Amanda Laufer
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**Re: University of Southern California (USC), Pac-12 Conference, and The
National Collegiate Athletics Association (NCAA)
Case 31-CA-290326**

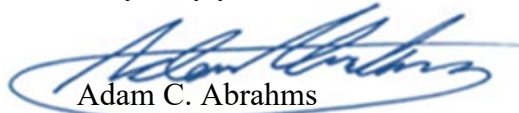
Dear Ms. Laufer:

As you are aware, this law firm represents the Respondent, the University of Southern California ("USC"), with respect to labor matters including the above-referenced matter.

Due to the tremendously expansive requests included in the Region's EAJA Letter, the busy time period at the end of the academic year, and the conclusion of the spring sports schedule at USC, we are, for the first time, requesting a two-week extension to file our position statement, with the relevant documents, until May 16, 2022. We believe this full extension is necessary to most effectively and efficiently aid in the Region's investigation and provide a meaningful response.

Should you have any questions, please do not hesitate to contact us.

Very truly yours,



Adam C. Abrahms

cc: Michael S. Ferrell (MFerrell@ebglaw.com)
Brock Olson (BOlson@ebglaw.com)